

# EXHIBIT K

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LINDA JANN LEWIS, MADISON LEE,  
ELLEN SWEETS, BENNY ALEXANDER,  
GEORGE MORGAN, VOTO LATINO,  
TEXAS STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
and TEXAS ALLIANCE FOR RETIRED  
AMERICANS,

Plaintiffs,

vs.

RUTH HUGHS, in her official capacity as  
Texas Secretary of State,

Defendant.

Civil Action No. 5:20-cv-00577

Related to *Gloria et al. v. Hughs et al.*,  
No. 5:20-cv-00527

**DECLARATION OF LINDA JANN LEWIS IN SUPPORT OF PLAINTIFFS' MOTION**

Pursuant to 20 U.S.C. § 1746, I, Linda Jann Lewis, declare as follows:

1. My name is Linda Jann Lewis. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I live in Waco, Texas, and am a registered voter in McLennan County. I am 73 years old and a member of the Texas Conference of the National Association for the Advancement of Colored People ("NAACP").

3. I have worked as the McLennan County elections administrator, a substitute teacher, a public information officer for emergency relief efforts in the state, a legislative consultant for the Texas Faculty Association, the Human Director in Travis County, the City of Waco's Equal Employment Opportunity Officer, and in the administrations of governors Bill Clemmons and Mark White. I have been on the Board of the McLennan County Branch of Texas

Democratic Women and the Board of the Austin Community Radio Inc., which is one of six independent African American controlled radio companies in the country. I also helped found the Austin Black Arts Alliance and am a member of the Afro American Players Inc., a theater company that produces plays about race relations in the United States. Currently, I volunteer with the NAACP as the Political Action Chair and work with the national organization's legal defense on voter protection. I also currently volunteer with the Waco Democratic Party and the Texas Democratic Party, consulting on voting issues.

4. Participating in elections is extremely important to me. I have voted in every single election, including all federal, state, and local elections, since 1965. Lyndon Johnson passed the Voting Rights Act while I was at freshman orientation at the University of Texas, and I immediately registered to vote on campus and joined the University of Texas chapter of the NAACP and the UT Democrats.

5. Although I have been able to vote by mail since turning 65 years old, I have not elected to do so because I do not have confidence that my ballot will be counted in McLennan County. However, because of my age and related health concerns, I have applied to vote by mail in November for the first time because I am concerned about the risk of contracting COVID-19, to which I am more susceptible to severe complications. Additionally, unless something drastically changes regarding the pandemic, I will also not be able to volunteer on Election Day or for early voting because it will not be safe to be around so many people who are standing in line and waiting to vote.

6. I suffer from a disability called kerataconus that affects my vision. To improve the impairments caused by kerataconus, I have had two cornea surgeries, four cataract surgeries, and most recently, a tissue transplant in my right eye. Despite these procedures, I still suffer from

impaired vision, which affects my ability to consistently sign my name. Due to my declining vision, my signature has changed over time. I am concerned that my mail-in ballot will be rejected because of signature mismatch, despite the fact that I personally signed my application to vote by mail and will personally sign the ballot carrier envelope. I have considered asking a friend to look over my mail-in ballot to ensure that the markings, including my signature, are legible, which makes me uncomfortable in that it violates the privacy and independence of my vote.

7. Because McLennan County does not prepay postage for mail ballots, I am also concerned about obtaining the necessary postage to mail my ballot in. I have to independently secure and pay for postage to mail my ballot. While I generally support the postal service, I do not think that I should have to spend money to cast my vote. Because of my age and preexisting conditions, I also try to avoid making unnecessary trips outside my home and do not want to have to leave my home to go buy stamps. I have not owned or driven an automobile in five years because of my vision impairment, which would make it much more difficult to obtain stamps even if I was willing to go out. And I do not keep a supply of stamps in my home because I live on less than a thousand dollars a month from Social Security and I have six monthly incurring bills that require almost every dollar of that, so I do not have the disposable income to use on stamps. Notably, I was delayed in applying to vote by mail because I didn't have adequate postage and had to wait for a friend to have the opportunity to bring stamps to me.

8. I am very concerned that with so many more people relying on the mail system, and not just for mailing ballots; my mail service will also be delayed. I am also worried that with Texas's large senior citizen population there will be many people, who, like me, have to vote by mail, and the addition of so many people voting by mail may mean that I do not receive my ballot

in time to send it off with plenty of time for it to be received and for me to confirm that it was counted.

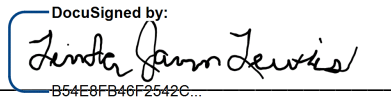
9. One of the main reasons why I have never voted by mail is because I am not confident that my ballot will be counted in McLennan County. I have been an advocate for fair voting in the county, and part of that has been criticizing the unfair practices of how elections are administered in the county. I suspect that my mail-in ballot will be subject to additional scrutiny in an effort to reject it so that my vote is not counted because I am not liked by the county administration.

10. I believe that *nothing* is more important than exercising the right to vote. I do not want to have to make a choice between my health, which is also important, and the franchise. I would feel more confident that every ballot will be counted if people have more than one option for returning their mail-in ballot, including having trusted individuals collect those ballots and deliver them directly to the election's office.

11. The Challenged Provisions frustrate my hard work in educating voters on voting by mail so that their voices are heard.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 17, 2020

By:   
Linda Jann Lewis